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**Cc:** []  
**From:** CN=Stephanie Skophammer/OU=R9/O=USEPA/C=US  
**Sent:** Mon 3/19/2012 8:51:18 PM  
**Subject:** historic flows/no action  
(embedded image)

Tom-

Following up... I can't find anything specific in writing about using historic flows for the No Action. I am sure Laura and I have discussed (I guess verbally) in the past. But I pulled our comments regarding historic flows (mostly in the context of the P&N) that we made in '09 - '11.

From our 2009 scoping letter/we hint at the need to seriously look at alternatives that involve reduced flow :

Reductions in Inflows and Exports

EPA fully appreciates that there is a substantial debate over the likely future scenario of water export regulation in the Bay Delta. In fact, the BDCP process may be one forum for resolving that debate. Generally, NEPA documents analyzing issues with uncertain outcomes will make sure that the range of alternatives at least brackets the range of potential outcomes, and EPA recommends that approach in this EIS/EIR.

Even disregarding different predictions about future regulatory scenarios, however, EPA believes that the EIS/EIR will need to include a significant analysis of alternatives reflecting reduced Delta inflow and reduced exports. Recent Department of Water Resources (DWR) studies of the potential impact of climate change on the Bay and Delta watershed predict significantly reduced inflow and reduced diversions over the next century. Holding regulatory, structural, and operating rules constant, the DWR study estimated climate-change induced reductions in Delta exports and reservoir carryover storage ranging from 7% to 19% at mid-century, and of 21% to 38% by year 2100.<sup>13113</sup> See Possible Impacts of Climate Change to California's Water Supply, California Climate Center, Summary Sheet, April 2009 (Available on DWR web site at [http://www.water.ca.gov/pubs/climate/climate\\_change\\_impacts\\_summary\\_sheet\\_april\\_2009/climate\\_change\\_impacts\\_summary\\_sheet\\_4-16-09\\_lowres.pdf](http://www.water.ca.gov/pubs/climate/climate_change_impacts_summary_sheet_april_2009/climate_change_impacts_summary_sheet_4-16-09_lowres.pdf)). Delta inflows will also be restricted in future years (compared to the historical record) due to changes in Trinity River diversions into the Sacramento River system and due to upstream water resource development by senior water rights holders.<sup>14214</sup> See, for example, discussion of CVPIA Programmatic Environmental Impact Statement analyses on USBR's web site. (Summary of Impact Assessment, p. 12; [http://www.usbr.gov/mp/cvpia/docs\\_reports/fpeis/index.html](http://www.usbr.gov/mp/cvpia/docs_reports/fpeis/index.html)).

Given these predicted developments outside of the regulatory debate, EPA believes that reduced inflow and reduced export scenarios are not just reasonable alternatives to evaluate, but represent a likely future for the Bay Delta basin that needs to be reflected in the EIS/EIR.<sup>15</sup>

And from our comments on the workplan in Aug 2011:

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